

Comments and Further Proposals

FCC 18-60

MB Docket 18-119

My background is over 42 years of experience as Chief Engineer and Contract Engineer for many licensees of full service AM and FM radio stations including several translator operations.

I believe the Commission's proposal addressing Translator issues is great and will save considerable Time and Resources ***IF implemented properly*** for "all parties" (the FCC, Full Service stations, and translator applicants/licensees). It will go a long way toward decreasing expenses, reducing delays and providing clarity and certainty for Full Service FM stations, Translator applicants, and licensees alike.

I am in complete **AGREEMENT** with the proposal to "modify Section 74.1233(a)(1) of the Rules to define an FM translator's change to any available FM channel as a minor change upon showing of interference to or from any other broadcast station". This will **decrease costs** and benefit some stations that would otherwise be forced to go off the air. HOWEVER, ***this proposal may be utilized to a lesser extent if a signal/interference (U/D) vs. complaint based system is adopted***.

As such, I am in complete **AGREEMENT** with the proposal to modify Section 74.1203(a)(3) to state that "no complaint of actual interference will be considered actionable if the alleged interference occurs outside the desired station's 54 dBμ contour". This is a necessity to save **Time and Resources** for "all parties" by no longer needing to address interference complaints outside the **minimum interference free contour** and preventing abuse. This change would affect only a miniscule number of listeners (if any) OUTSIDE the Full Service station's interference free contour (those stations would already be accepting interference **outside that contour** by other **Full Service** stations).

I ***STRONGLY DISAGREE*** with the concept of simply increasing the complaint threshold set forth in the proposal to "amend Sections 74.1204(f) and 74.1203(a)(3) to state that interference will be considered to occur whenever reception of a regularly used signal by six or more listeners, at separate locations using separate receivers, is impaired or is predicted to be impaired by the signals radiated by the FM translator station." I ***STRONGLY BELIEVE*** a contour based method is the only practical solution. Though the intent of this proposal is admirable, it simply protracts the unscientific and unpredictable "subjective" method and may exacerbate the existing problems. It could **INCREASE Time and Resources** consumed by all parties by a factor up to six or more. In some cases, there will be more subjective judgments to evaluate, still making no allowances for the various qualities of receivers, antennas, poor installation techniques and localized interference. Additionally, anyone abusing the system will simply come up with the required number of complaints, no matter what number is chosen.

As such, I ***STRONGLY BELIEVE*** in eliminating the "complaint based system" and ***adopting a (U/D) contour based method*** for translators. Interference to Full Service stations can then be reliably predicted. This not only helps the application process (clearly defined design parameters), it minimizes the need for any future intervention by "all parties." The likely result being minimal cases the FCC would need to investigate beyond the initial application's engineering review and an absolute **minimization of Time and resources utilized** (for ALL parties). A contour (U/D) based system has worked for Decades for full service stations, with concrete real world results that are **scientific, predictable, and reliable**.

The NPRM requests feedback about interference resolution if the FCC should "***rely exclusively on technical U/D ratios as proposed***" to which I would respond a ***strong AFFIRMATIVE!***

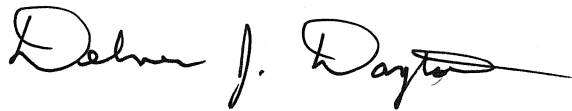
The NPRM further inquires if on/off tests should be included in remediation. These ***should no longer or rarely be needed*** (and their subjectivity eliminated) if U/D ratios for interference prediction are adopted. This drastically reduces, or completely eliminates ***Time and Resource*** utilization for all parties.

If contour interference ratios are adopted, a method to grandfather any existing translators would be good. It might carry a requirement there haven't been any "official" interference complaints ***already FILED WITH THE FCC to date*** (to avoid "backdating"), or they ***have been resolved***.

My final comments/proposal would be for the commission to consider a reduction or elimination of the 2nd and 3rd adjacent channel spacing and interference design requirements, as modern day receivers have very little issue with separating the signals.

Thank you for your consideration and hard work on revitalization issues such as this!

Sincerely,

A handwritten signature in black ink, reading "Delner J. Dayton". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Delner J. Dayton
2904 Mercury Avenue
Eau Claire, WI 54703

June 1, 2018